

SEAL

United States District Court

NORTHERN

DISTRICT OF

UNITED STATES OF AMERICA

V.

COMPLAINT

DESMOND KINTWANA BETHANY (01)
BAILEY JANE HANCE (02)

CASE NUMBER: 3-18-MJ- **362 BL**

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about June of 2015 through on or about April 12, 2018, defendants **DESMOND KINTWANA BETHANY** and **BAILEY JANE HANCE** committed the offense of Conspiracy to Engage In Sex Trafficking Through Force, Fraud or Coercion of AV1 and AV3 in violation of 18 U.S.C. § 1594(c) in Dallas County, in the Northern District of Texas, defendant did,

Conspiracy to Engage In Sex Trafficking Through Force, Fraud or Coercion of AV1 and AV3 in violation of 18 U.S.C. § 1594(c)

I further state that I am a(n) Special Agent with Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and that this complaint is based on the following facts:

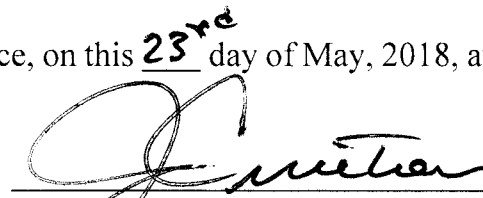
See attached Affidavit of Special Agent Bryan Collier, (ATF), which is incorporated and made a part hereof by reference.

Continued on the attached sheet and made a part hereof: XX Yes No


Bryan Collier

Special Agent Bureau of Alcohol, Tobacco, Firearms and Explosives

Sworn to before me and subscribed in my presence, on this 23rd day of May, 2018, at Fort Worth, Texas.


JEFFREY L. CURETON
United States Magistrate Judge

**AFFIDAVIT IN SUPPORT OF
APPLICATION FOR CRIMINAL COMPLAINT**

I, Special Agent Bryan Collier, hereafter identified as your Affiant the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

BACKGROUND

I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), in Irving, Texas, assigned to the High Intensity Drug Trafficking Area (HIDTA) group assigned to the Texas Anti-Gang (TAG) center. This complaint is based on the following facts gathered through my the investigation conducted in coordination the Texas Department of Public Safety (DPS), the Dallas Police Department (DPD), the Carrollton Police Department (CPD), and the Department of Homeland Security Investigations (HSI). Our investigation included the interviews of several victims, investigative techniques such as administrative subpoenas and judicial search warrants, and through reports or other information relayed to me by other law enforcement agencies including, but not limited to: DPD, CPD, Austin Police Department, and DPS.

INTRODUCTION

1. I have been a criminal investigator with ATF HIDTA for the past year, with much of that time devoted to investigating gangs, illegal narcotics distribution and human trafficking. I have participated in training and investigations involving these subject matters. Prior to my work at ATF, I worked for the Texas Department of Public Safety

as a State Trooper for approximately one year. Before working at DPS, I worked for the United States Secret Service, Uniformed Division for over a year. Prior to my work in law enforcement, I served in the United States Coast Guard for seven years. In the scope of my employment, I am in routine contact with experts in the field of human trafficking and gang activity. As a law enforcement officer, I have used a variety of methods to investigate crime, including, but not limited to, visual surveillance, witness interviews, the use of search warrants, confidential informants, and undercover agents.

2. As a criminal investigator for ATF, I have been involved in the interviewing and debriefing of defendants, informants, and witnesses and other persons who have personal knowledge of human trafficking. I have testified in judicial proceedings and prosecutions for violations of laws concerning narcotics and firearms violations. I routinely work with other law enforcement agencies on a cooperative basis; through these contacts, I have gained experience and knowledge in the investigation and prosecution of human traffickers and dismantling human trafficking organizations.

3. This affidavit sets forth facts and suggests reasonable inferences from those facts, establishing that there is probable cause to believe that from on or about June of 2015 through on or about April 12, 2018, in the Dallas Division of the Northern District of Texas and elsewhere, **DESMOND KINTWANA BETHANY** and **BAILEY JANE HANCE** committed the offense of Conspiracy to Engage In Sex Trafficking Through Force, Fraud or Coercion of AV1 and AV3 in violation of 18 U.S.C. § 1594(c).

PROBABLE CAUSE

4. In December of 2017, DPS and the Carrollton Police Department (CPD) Gang Unit received information about a possible victim of human trafficking. Law enforcement interviewed the twenty-two year old woman (hereinafter “AV1”), who provided information in regards to BETHANY and BAILEY HANCE, among others, were engaged in human trafficking and weapons possession. In addition, AV1 stated that BAILEY HANCE worked as BETHANY’s “bottom girl” and furthered the sex trafficking operation by coordinating the commercial sex activities of various victims and by employing threats and violence on victims at BETHANY’s direction. AV1 stated that BETHANY also employed violence, threats of violence and coercion towards her and other victims to cause them to engage in commercial sex acts. AV1 stated that BETHANY held victims against their will and forced the victims to conduct continuous sex acts in exchange for money that was then taken by BETHANY. AV1 stated BETHANY is a member of the criminal street gang “BLOODS” (law enforcement determined BETHANY is a confirmed BLOODS gang member listed in the Texas Gang Investigative Database known as “TxGang”).

5. AV1 also stated that BETHANY was her “pimp,” and he kept all of the money she earned engaging in commercial sex acts. AV1 indicated she was trafficked by BETHANY during two time periods: (1) from approximately November of 2016 through November of 2017, and (2) from mid-March of 2018 through approximately April 12, 2018. AV1 indicated she first met BETHANY through Facebook.

Shortly after they began communicating, BETHANY took her to his residence at 3711 Morris Street, Dallas, Texas, where they lived together with HANCE and others over several months.

6. AV1 stated BETHANY routinely raped AV1 as well as other victims as a means of control. She stated that BETHANY utilized fear and intimidation to compel her and others to engage in commercial sex acts. In addition, BETHANY would assault AV1 and the other victims with various items, including: (1) clothing hangers; (2) boxing gloves; (3) his fists and (4) tree branches or “switches” as “punishment” for either disrespecting BETHANY or not making enough money for BETHANY engaging in commercial sex acts. AV1 also said that she and other victims would be beaten and “punished” by BETHANY in front of each other to show the victims what could happen if the victim did not do what BETHANY ordered them to. In addition, AV1 stated that she and the other victims were not free to leave the house on Morris Street. AV1 indicated that BETHANY placed cameras and locks on the doors and windows of this house to prevent them from escaping. AV1 further stated that BETHANY routinely slept in the living room with a handgun in his possession to prevent victims from leaving the house during the night. BETHANY is a convicted felon, and is prohibited from possessing firearms under federal law.

7. In addition, AV1 also provided information regards to BAILEY HANCE, whom AV1 states is BETHANY’S “bottom girl.” AV1 noted that BETHANY required AV1 to get a tattoo containing a crown to “brand” her as belonging to him, because

BETHANY's pimp name is "King MVP." HANCE also has a crown tattoo she displays on Facebook photos that she got at BETHANY's direction. BETHANY has a gold crown necklace as well as a gold "PIMP" necklace he often wears. AV1 indicated BETHANY uses money earned from commercial sex acts to purchase expensive brand name items including jewelry, high-end designer clothing, designer shoes and cars.

8. During the course of this investigation, law enforcement identified two additional adult sex trafficking victims of BETHANY and BAILEY HANCE (hereinafter referred to as AV2 and AV3). During an interview with law enforcement, AV2 recounted how she got involved with BETHANY and BAILEY HANCE. In approximately November of 2017, AV2 met BETHANY through a mutual friend. BETHANY communicated with AV2 for some time, and he and HANCE eventually drove to Kansas and brought AV2 to Dallas, Texas for the purpose of causing her to engage in commercial sex acts.

9. AV2 stated that she witnessed BETHANY using violence on women that were engaging in commercial sex acts at his direction on numerous occasions. For example, AV2 saw BETHANY assault HANCE until she (HANCE) was bleeding, and AV2 observed BETHANY hit girls with boxing gloves as "punishment." AV2 stated she witnessed BETHANY hit nearly every girl at the residence at different times. AV2 stated that she observed HANCE carry out "discipline" at BETHANY'S direction by using violence on victims, and HANCE would assault the girls for various disciplinary reasons. AV2 also stated that HANCE is BETHANY'S "bottom girl".

AV2 explained that a “bottom girl” normally has been with the pimp the longest, makes the most money and/or shows the most loyalty to the “pimp”. AV2 also stated that HANCE would report any issues with the girls to BETHANY.

10. In addition, AV2 reported seeing BETHANY with firearms, and keeping them in the house on 3711 Morris Street. AV2 stated that BETHANY and HANCE would provide the girls with narcotics such as: heroin, ecstasy (MDMA) and cocaine, and BETHANY would keep the girls “doped up” or high on the drugs as a means of control. AV2 did not feel free to leave BETHANY, and she was able to contact her father to ask for help. AV2’s father contacted the Dallas Police Department, who went and helped AV2 leave BETHANY’S house on or about November 30, 2017.

11. During the course of the investigation, law enforcement also learned about twenty-four-year-old AV3, who engaged in commercial sex acts for BETHANY and BAILEY HANCE from June 2015 until approximately January of 2016. During this time, BETHANY routinely raped AV3, as well as other unidentified sex trafficking victims at the house located at 3711 Morris Street in Dallas. BETHANY also kept all proceeds from her commercial sex acts, and AV3 was not free to leave. AV3 stated that within a few days of moving in with BETHANY and the other girls/women, they all loaded up and traveled to Miami, Florida. AV3 stated that during the trip to Miami, AV3 was blindfolded because BETHANY did not want AV3 to know where they were going. AV3 stated as soon as they arrived in Miami, BETHANY and HANCE started posting Backpage.com ads to get all of his victims engaging in commercial sex acts quickly after

arriving. AV3 stated that BETHANY controlled all of the Backpage.com accounts for the girls, and each girl typically had three (3) commercial sex ads posted at one time to ensure the ad remained at the top of Backpage.com when potential customers logged onto the site.

12. In addition, AV3 stated that BETHANY used stolen identification cards that he bought from “crack-heads” (frequent users of crack-cocaine) in the neighborhood when reserving rooms on these trips. AV3 stated while in Florida, BETHANY directed AV3 and the other girls to conduct commercial sex acts in Miami, Tallahassee, Tampa and Fort Lauderdale. AV3 stated she and other victims had to engage in numerous commercial sex acts daily both out of the state of Texas and in the Dallas area, BETHANY did not allow any days off. AV3 stated that BETHANY took all forms of identification from his victims and cut them up so law enforcement would not be able to identify the girls if they were encountered.

13. AV3 described the various methods BETHANY used to threaten and Control victims. AV3 stated BETHANY has several guns, including a .22 caliber pistol, four (4) nine millimeter pistols, and a matching pair of pink pistols that he routinely keeps at the house on Morris Street. BETHANY threatened the victims with these guns. AV3 stated that BETHANY directed all of the girls working for him to have long hair so he could use their hair to control them as he assaulted them in case they ever “acted up” as a form of discipline. AV3 stated that on one occasion BETHANY physically drug HANCE across the floor by the head, and BETHANY started assaulting HANCE with a

heavy belt that had what AV3 described as metal “studs” on it. AV3 stated that when BETHANY was finished assaulting HANCE with the belt, he would often grab a “switch” (small tree branch) from a tree and use it to assault HANCE. AV3 stated that BETHANY would use his hands, feet, belts, mirrors, and water bottles, among other items, to discipline the girls that worked for him. AV3 stated that BETHANY sexually assaulted each of the girls on a regular basis at the Morris Street house. AV3 stated that she was never free to leave the location because BETHANY, HANCE or someone else was always present. AV3 stated that she was assaulted by BETHANY and HANCE for disciplinary reasons, due to AV3 disobeying rules that BETHANY had for the girls. BETHANY kept all of the money from AV3’s commercial sex acts throughout the time she worked at his direction.

14. AV3 recounted a particular series of events and abuse that happened in late 2016 through early 2017 that led to her escape. HANCE told BETHANY about a “rule” violation by AV3 –namely that she used drugs with a customer and allowed him to take a photo of her during a commercial sex transaction. After HANCE told BETHANY about this “rule” violation, BETHANY continuously assaulted her over an extended period of time. AV3 stated that BETHANY strangled AV3 with a curling iron cord, resulting in her starting to lose consciousness. AV3 stated that BETHANY drug AV3 to the living room by the back of her hair and kicked her repeatedly in the stomach. AV3 stated that HANCE and another girl witnessed this assault. AV3 stated that during the incident, HANCE handed BETHANY his heavy belt with metal spikes, bottles of water, and

picked a switch from a tree in the back yard to assault AV3 with. AV3 stated that BETHANY instructed HANCE to assault AV3 with the switch across AV3's back, and she did so. AV3 stated that BETHANY proceeded to strike her repeatedly all over her body and pour water over AV3's face preventing her from breathing. After this assault, BETHANY forced AV3 to sleep naked on the bare floor without a blanket. AV3 stated that BETHANY woke up the next morning and ordered AV3 to take a shower and proceeded to assault her with a belt while in the shower. AV3 stated that after exiting the shower and being assaulted, BETHANY raped her. He kept her in the house for several days, and would not allow her to leave. AV3 stated that one day she wanted to attempt to escape, and when BETHANY permitted her to take out the trash, AV3 sprinted away from the house and jumped into an ice cream truck, begging the driver to take her to the police.

15. When BETHANY realized AV3 escaped, he left the house looking for her, BETHANY approached the ice cream truck while she was hiding, asking the driver where AV3 was. The ice cream truck driver told BETHANY they had not seen her, and BETHANY then pointed a firearm at the vendor, threatening to harm the ice cream vendor if the ice cream vendor did not tell BETHANY where AV3 was. AV3 stated the vendor quickly left the location, drove to a nearby school and flagged down a school police officer, who got her to the Dallas Police Department (DPD). DPD took photographs of her extensive injuries. AV3 states that she has been living her life in fear since the day she ran away from BETHANY.

AV3 states that she has difficulty walking alone, sleeping at night, and assuming a “normal life” due to the violence that BETHANY and HANCE inflicted upon her.

16. In May of 2018, law enforcement learned that AV1 was lured/tricked into going back to BETHANY and HANCE’s house by a woman that was working for BETHANY. AV1 stated that from late March 2018 to approximately April 12, 2018, AV1 was forced by BETHANY and HANCE to engage in commercial sex acts. AV1 stated that she continuously begged BETHANY to allow her to leave, but whenever she asked, BETHANY beat AV1. AV1 states that there were approximately five (5) girls inside of BETHANY’S residence, and BETHANY routinely raped the girls. AV1 stated that BETHANY would assault her and the other girls in the residence with his hands or he would use plastic hangers or other objects to assault them. AV1 was not free to leave, and if AV1 tried to leave she felt that her life was in danger. AV1 observed BETHANY with at least two firearms in the house on Morris Street during March and April of 2018 while she was living there. She again indicated that BETHANY has surveillance cameras and locks throughout both the inside and outside of the house in order to detect law enforcement and to prevent victims from escaping from the house. BETHANY routinely slept on the couch in the living room of the house with guns to prevent victims from escaping.

17. AV1 stated that there were at least two (2) new girls at the residence that were working for BETHANY since the last time she was there in late 2017 as well as HANCE and another adult female victim referred to as “Russian Barbie,” she knew from

before. AV1 stated that in BETHANY'S absence, BAILEY HANCE would collect money from the girls, post ads of the girls on the commercial sex website "DADDY'S LIST" and report to BETHANY on a daily basis about whether the girls met their "quota" in conducting commercial sex acts. BETHANY expected girls to earn a certain amount of money each day (often \$1000 or more) engaging in commercial sex, and if they did not they were "punished." BETHANY continued to keep all of the proceeds of AV1's commercial sex acts.

18. AV1, AV2 and AV3 all described BETHANY and HANCE using numerous cell phones and electronic devices to conduct commercial-sex related activities. This included placing commercial sex ads, communicating with commercial sex customers and well as the victims regarding the money earned though commercial sex.

19. In addition, BETHANY and HANCE would routinely drive the victims to commercial sex activities in an Audi and a Jaguar, and more recently in a cargo-style van, and BETHANY created and posted videos on Facebook that depict some of his victims in these cars as well as money they earned from commercial sex. BETHANY also posted several videos and photos of him and/or HANCE with large sums of US currency, bragging about how much money his victims made engaging in commercial sex acts.

20. In mid-April 2018, AV1 planned her escape from BETHANY. AV1 used a cell phone belonging to BETHANY that was supposed to be for commercial sex transactions, and she pretended to contact a regular "john" (customer) to set up a "date"

(commercial sex act). Instead, AV1 texted her brother to set up a “date” where she could be rescued. AV1 stated that her brother had responded to meet at an unknown condominium in Dallas, and AV1 stated that HANCE drove AV1 to this condominium to conduct the commercial sex act. Instead, AV1 met up with her brother, and he snuck her out of the area.

21. Law enforcement has located and documented numerous advertisements for commercial sex via subpoena from Backpage.com that are tied to BETHANY and HANCE’s sex trafficking organization. In addition, law enforcement is waiting on additional documents from Backpage.com, which was recently seized by the FBI.


22. AV1 and AV3 each positively identified DESMOND BETHANY and BAILEY HANCE as the individuals that used force, fraud or coercion to cause them to engage in commercial sex acts.

23. Law enforcement has reviewed the publicly-available Facebook accounts of BETHANY and HANCE, among others. These accounts contain photos of human trafficking victims, as well as videos of BETHANY counting large sums of cash that he received from commercial sex activity from his victims. BETHANY has posted numerous photos of him with designer items and gold and diamond jewelry, which is a common method used by pimps to recruit new victims and to brag about the success of their commercial sex enterprise. BETHANY also uses Facebook to identify and contact victims, and to communicate with commercial sex customers.

24. Your Affiant has observed that Suspects DESMOND BETHANY and BAILEY HANCE operate as a criminal organization to traffic AV1 and AV3, among others. While they were engaging in commercial sex acts at the direction of one Suspect, the other Suspect was usually present or in contact with the other Suspect. HANCE would routinely report to BETHANY about the earnings of AV1 and AV3, and about if they violated any of his "rules." In addition, both Suspects would beat and threatened AV1 and AV3 if they did not engage in enough commercial sex acts.

CONCLUSION

25. Based on the foregoing facts and circumstances, I respectfully submit that there is probable cause to believe that beginning on or about June 2015 and continuing through on or about April 12, 2018, within the Dallas Division of the Northern District of Texas and elsewhere, **DESMOND KINTWANA BETHANY** and **BAILEY JANE HANCE** committed the offense of Conspiracy to Engage In Sex Trafficking Through Force, Fraud or Coercion 18 U.S.C. § 1594(c) as to victims AV1 and AV3.



BRYAN COLLIER
Special Agent
Bureau of Alcohol, Tobacco, Firearms and Explosives

Subscribed and sworn before me this 23rd day of May, 2018 at 11:00 a.m.
in Fort Worth, Texas.



JEFFREY R. CURETON
United States Magistrate Judge